1	JONATHAN K. LEVINE (SBN 220289)	
2	jkl@pritzkerlevine.com ELIZABETH C. PRITZKER (SBN 146267)	
3	ecp@pritzkerlevine.com BETHANY CARACUZZO (SBN 190687)	
4	bc@pritzkerlevine.com	
5	PRITZKER LEVINE LLP 180 Grand Avenue, Suite 1390	
6	Oakland, CA 94612	
7	Telephone: (415) 692-0772 Facsimile: (415) 366-6110	
8		
	DANIEL C. GIRARD (SBN 114826) dcg@girardgibbs.com	STEVEN N. WILLIAMS (SBN 175489) swilliams@cpmlegal.com
9	ELIZABETH A. KRAMER (SBN 293129)	ALEXANDRA P. SUMMER (SBN 266485)
10	eak@girardgibbs.com ANDRE M. MURA (SBN 298541)	asummer@cpmlegal.com STEPHANIE D. BIEHL (SBN 306777)
11	amm@classlawgroup.com	sbiehl@cpmlegal.com
12	GIRARD GIBBS LLP 601 California Street, Suite 1400	COTCHETT, PITRE & McCARTHY, LLP San Francisco Airport Office Center
13	San Francisco, CA 94104	840 Malcolm Road, Suite 200
14	Telephone: (415) 981-4800 Facsimile: (415) 981-4846	Burlingame, CA 94010 Telephone: (650) 697-6000
15	1 desimile. (113) 701 1010	Facsimile: (650) 697-0577
16	 Plaintiffs' Co-Lead Counsel	
17	[Additional Counsel Appear on Signature Pages]	
18	UNITED STATES DISTRICT COURT	
19		
20	FOR THE DISTRICT OF NORTHERN CALIFORNIA	
21	SAN JOSE DIVISION	
22	IN RE: LENOVO ADWARE LITIGATION	Case No. 5:15-md-02624-HSG
23	This Document Relates to All Cases	STIPULATION AND [PROPOSED] ORDER RE
24		AMENDED COMPLAINT
25		
26		
27		
28		

On October 27, 2016, the Court granted in part defendant Lenovo's motion to dismiss plaintiffs' 1 Consolidated Class Action Complaint and granted in part plaintiffs' motion for class certification. 2 3 (Dkt. No. 153). Pursuant to the Court's October 27 Order, plaintiffs must file any amended complaint by Monday, November 28, 2016, the first business day following the Thanksgiving holiday. 4 5 In light of the impending Thanksgiving holiday, plaintiffs and Lenovo have conferred and agree, subject to Court approval, to a brief extension of the deadline for plaintiffs to file any amended 6 7 complaint. NOW THEREFORE, the parties, by and through their respective counsel of record, hereby 8 stipulate as follows: 9 10 1. The deadline for plaintiffs to file any amended complaint shall be extended from November 28, 2016 to December 7, 2016; and 11 2. The deadline for Lenovo to respond to plaintiffs' amended complaint shall be extended 12 13 from December 28, 2016 to January 16, 2017. 14 15 IT IS SO STIPULATED. Dated: November 22, 2016 PRITZKER LEVINE LLP 16 /s/ Jonathan K. Levine 17 18 Jonathan K. Levine (SBN 220289) Elizabeth C. Pritzker (SBN 146267) 19 180 Grand Avenue, Suite 1390 Oakland, California 94612 20 Telephone: (415) 692-0772 21 Facsimile: (415) 366-6110 jkl@pritkzkerlevine.com 22 ecp@pritzkerlevine.com 23 GIRARD GIBBS LLP 24 /s/ Daniel C. Girard 25 Daniel C. Girard (SBN 114826) 26 Elizabeth A. Kramer (SBN 293129) Andre M. Mura (SBN 298541) 27 601 California Street, Suite 1400 28 San Francisco, CA 94104 Telephone: (415) 981-4800

Facsimile: (415) 981-4846 1 dcg@girardgibbs.com 2 eak@girardgibbs.com amm@classlawgroup.com 3 COTCHETT, PITRE & McCARTHY, LLP 4 5 /s/ Alexandra P. Summer 6 Steven N. Williams (SBN 175489) 7 Alexandra P. Summer (SBN 266485) Stephanie D. Biehl (SBN 306777) 8 San Francisco Airport Office Center 840 Malcolm Road, Suite 200 9 Burlingame, CA 94010 10 Telephone: (650) 697-6000 Facsimile: (650) 697-0577 11 swilliams@cpmlegal.com asummer@cpmlegal.com 12 sbiehl@cpmlegal.com 13 Plaintiffs' Co-lead Counsel 14 **K&L GATES LLP** 15 16 /s/ Daniel J. Stephenson 17 Daniel J. Stephenson (SBN 270722) 10100 Santa Monica Blvd., 7th Floor 18 Los Angeles, CA 90067 19 Telephone: (310) 552-5000 Facsimile: (310) 552-5001 20 Dan.stephenson@klgates.com 21 Counsel for Defendant Lenovo 22 23 24 25 26 27 28

1	[PROPOSED] ORDER
2	Pursuant to Stipulation, it is SO ORDERED.
3	
4	DATED: 11/23/2016 Haywood S. Hill
5	HONORABLE HAYWOOD S. GILLIAM, JR. UNITED STATES DISTRICT COURT JUDGE
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

ATTESTATION I, Jonathan K. Levine, am the ECF user whose ID and password are being used to file this document. In compliance with Local Rule 5-1(i)(3), I hereby attest that all other signatories listed have concurred in this filing. /s/ Jonathan K. Levine Jonathan K. Levine